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Attorneys for Defendants
FLUOR CORPORATION and
FLUOR MAINTENANCE SERVICES, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

TIMOTHY RAY RICHARDSON

Plaintiff,

v.

FLUOR CORPORATION; FLUOR
MAINTENANCE SERVICES, INC.; DOES 1
THROUGH 10, INCLUSIVE,

Defendant.

Case No. CV-13-1908-SBA

SUPPLEMENTAL STIPULATION AND
~~PROPOSED~~ ORDER FOR EXTENDING
EXPERT DISCOVERY DEADLINES

Complaint Filed: April 25, 2013
Trial Date: October 15, 2014

Plaintiff Timothy Ray Richardson and defendants Fluor Corporation (“Fluor”) and Fluor Maintenance Services, Inc. (“FMS”), through their respective counsel, respectfully request the Court modify its pretrial scheduling order (Dkt No. 38) to extend the deadline to complete expert discovery.

1. The Parties request the Court extend the deadline for expert discovery to August 31, 2014. The current deadline to complete expert discovery is July 18, 2014. (Dkt. No. 66.)

2. This extension is necessary to permit the deposition of plaintiff’s retained expert, Beth De Lima (set for August 13, 2014), and defendants’ retained expert, Ronald Roberts, whose deposition has yet to be set. The parties are meeting and conferring regarding finalizing a date for Dr. Roberts’ deposition.

3. The requested extension will not conflict with any other pretrial scheduling deadlines.

4. Therefore, pursuant to Local Rule 16-2(d)-(e) and Local Rule 7, the Parties herby submit this stipulation for modification of the pretrial scheduling order (Dkt. No. 38).

DATED: July 17, 2014

LAW OFFICES OF KAPLAN & MACLELLAN

By: /s/ Douglas MacLellan
Douglas Cameron MacLellan

Attorneys for Plaintiff
TIMOTHY RAY RICHARDSON

DATED: July 17, 2014

OGLETREE, DEAKINS, NASH, SMOAK &
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By: /s/ Jill Cartwright
Thomas M. McInerney
Jill V. Cartwright

Attorneys for Defendants
FLUOR CORPORATION and
FLUOR MAINTENANCE SERVICES, INC.

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SIGNATURE ATTESTATION

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from the other signatories.

DATED: July 17, 2014

By: /s/ Jill V. Cartwright
Jill V. Cartwright

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 7/21/2014


Sandra Brown Armstrong
United States District Judge

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